

Agenda

May 1, 2014 – 1:30 pm
Governmental Center,
301 North Olive Avenue, 6th Floor
Commissioners Chambers

Palm Beach County

Commission on Ethics

300 North Dixie Highway
West Palm Beach, FL 33401

561.355.1915

FAX: 561.355.1904

Hotline: 877.766.5920

E-mail:

ethics@palmbeachcountyethics.com

Commissioners

Salesia V. Smith-Gordon, Chair

Michael S. Kridel, Vice Chair

Michael F. Loffredo

Carmine A. Priore

Clevis Headley

Executive Director

Steven P. Cullen

Intake Manager

Gina A. Levesque

Staff Counsel

Christie E. Kelley

Senior Investigator

Mark E. Bannon

Investigator

Anthony C. Bennett

- I. Call to Order
- II. Roll Call
- III. Introductory Remarks
- IV. Approval of Minutes from April 3, 2014
- V. Sunshine Law Presentation – Best Practices
 - a. Lenny Berger, Chief Assistant County Attorney
 - b. Daniel Funk, Assistant State Attorney
- VI. Processed Advisory Opinions (Consent Agenda)
 - a. RQO 14-007
 - b. RQO 14-008
- VII. Items Pulled from Consent Agenda
 - a.
- VIII. Proposed Advisory Opinions
 - a. RQO 14-009
- IX. Model Rule Policy
- X. Executive Director Comments
- XI. Commission Comments
- XII. Public Comments
- XIII. Adjournment

If a person decides to appeal any decision made by this Commission with respect to any matter considered at this meeting or hearing, (s)he will need a record of the proceedings, and that, for such purpose, (s)he may need to ensure that a verbatim record of the proceedings is made, which record includes the testimony and evidence upon which the appeal is to be based.

**OFFICIAL MEETING MINUTES
OF THE
PALM BEACH COUNTY COMMISSION ON ETHICS
PALM BEACH COUNTY, FLORIDA**

APRIL 3, 2014

**THURSDAY
1:31 P.M.**

**COMMISSION CHAMBERS
GOVERNMENTAL CENTER**

I. CALL TO ORDER

II. ROLL CALL

MEMBERS:

Salesia V. Smith-Gordon, Chair
Michael S. Kridel, Vice Chair
Clevis Headley
Michael F. Loffredo
Carmine A. Priore, III

STAFF:

Mark E. Bannon, Commission on Ethics (COE) Senior Investigator
Anthony C. Bennett, COE Investigator
Steven P. Cullen, Esq., COE Executive Director
Christie E. Kelley, Esq., COE Staff Counsel
Gina A. Levesque, COE Intake Manager

ADMINISTRATIVE STAFF:

Julie Burns, Deputy Clerk, Clerk & Comptroller's Office

III. INTRODUCTORY REMARKS – None

IV. APPROVAL OF MINUTES FROM MARCH 6, 2014

MOTION to approve the March 6, 2014, minutes. Motion by Michael Kridel, seconded by Clevis Headley, and carried 5-0.

IV. – CONTINUED

Chair Salesia Smith-Gordon said that as a point of order, the March 6, 2014, minutes were correct; however, she made an incorrect statement regarding the vice-chair's self-nomination. She requested that her statement be rescinded; that the original motion be vacated; and that the floor be opened for proper vice-chair nominations.

MOTION to nominate Michael Kridel as vice-chairperson. Motion by Carmine Priore, seconded by Salesia Smith-Gordon, and carried 5-0.

(CLERK'S NOTE: A motion was inadvertently made by Commissioner Carmine Priore to approve the March 6, 2014, minutes as amended.)

Chair Smith-Gordon clarified that the motion to amend was unnecessary since the March 6, 2014, minutes were accurate.

RECESS

At 1:36 p.m., the chair declared the meeting recessed for executive session.

V. EXECUTIVE SESSION – C14-001

RECONVENE

At 3:00 p.m., the meeting reconvened, and at Chair Smith-Gordon's request for a roll call, Vice Chair Kridel and Commissioners Headley, Loffredo, and Priore were present.

Vice Chair Michael Kridel read the Public Report Finding No Probable Cause and Final Order of Dismissal:

Complainant, Steven P. Cullen, Executive Director of the Commission on Ethics, filed the above referenced Complaint on January 6, 2014, alleging that Respondent, Connor Lynch, former Chairperson of the City of Delray Beach Planning and Zoning Board, possibly violated Section 2-443(c), *Disclosure of Voting Conflicts*, and Section 2-443(a)(5), *Misuse of Public Office or Employment of the Palm Beach County Code of Ethics*.

V. – CONTINUED

Pursuant to Chapter 2, Article V, Division 8, §2-258(a) of the Palm Beach County Code, the Commission on Ethics is empowered to enforce the Palm Beach County Code of Ethics. On April 3, 2014, the Commission conducted a hearing and reviewed the Memoranda of Inquiry, Investigation, Legal Sufficiency and No Probable Cause, the recommendation of staff, and the oral statement of the Advocate. The Commission concluded no probable cause exists, and the Complaint was dismissed.

Therefore it is:

Ordered and adjudged that the Complaint against Respondent, Connor Lynch, is hereby dismissed.

Done and ordered by the Palm Beach County Commission on Ethics in public session on April 3, 2014. By: Salesia V. Smith-Gordon, Chair.

(CLERK'S NOTE: The clerk added the language as printed in the Public Report Finding No Probable Cause and Final Order of Dismissal.)

Chair Smith-Gordon said that anyone wishing to comment should complete a comment card.

VI. PROCESSED ADVISORY OPINIONS (CONSENT AGENDA)

VI.a. Request for Opinion (RQO) 14-005

MOTION to approve the consent agenda. Motion by Michael Kridel, seconded by Carmine Priore, and carried 5-0.

VII. ITEMS PULLED FROM CONSENT AGENDA – None

(This space intentionally left blank.)

VIII. PROPOSED ADVISORY OPINIONS

VIII.a. RQO 14-006

Christie Kelley, Esq., COE staff counsel, said that:

- A Village of Wellington (Village) councilman asked whether he was prohibited from participating and voting on a matter which may come before the Village council regarding a new civil aviation ordinance affecting the development where he lived.
- Staff submitted the following:
 - Based on the facts presented, the councilman was not prohibited from voting on the matter since any financial benefit or loss attributable to him as an individual Wellington Aero Club (Aero Club) homeowner was shared with similarly situated members of the general public.
 - The matter did not constitute a unique circumstance whereby his personal gain or loss significantly exceeded that of other members of the affected class.
 - Public officials were prohibited from using their positions to give themselves a unique financial benefit.
 - In evaluating conflict of interest under the Palm Beach County Code of Ethics, the Commission on Ethics (COE) considered how many individuals stood to gain or lose from a decision, and whether the gain or loss was remote and speculative.
 - A class of persons who stood to gain from a decision was small; however, it was more likely that an official would have a conflict.
 - Based on the class size of 268 Aero Club homes, the councilman was not prohibited from participating and voting on the civil aviation ordinance although he lived in the community.

VIII.a. – CONTINUED

- The exact ordinance was still unavailable for COE review; therefore, staff added language cautioning the councilman to carefully examine the ordinance’s text when available to ensure that it did not give him a special financial benefit.
- Use of the word, “any,” in the Code of Ethics’ (Code) definition of financial benefit removed any measure of magnitude regarding the financial benefit.

Commissioner Priore said that the Code’s reference to financial benefit did not apply strictly to money, and that financial benefit, as written, was a very broad subject. He added that a benefit’s value could be established by the individual requesting an opinion.

Ms. Kelley explained that the definition of financial benefit included anything else of value.

MOTION to approve proposed advisory opinion letter RQO 14-006 as amended to include the added language as discussed. Motion by Carmine Priore, seconded by Michael Loffredo, and carried 5-0.

IX. EXECUTIVE DIRECTOR COMMENTS

IX.A.

DISCUSSED: Legislative Bills Update.

Steven P. Cullen, Esq., COE Executive Director, said that:

- Florida Senate Bill (SB) 846 passed the Senate and was before the House of Representatives (House). The bill offered technical amendments to State law and did not directly impact the COE’s operations.
- Florida SB 1474 underwent two significant amendments and passed the Ethics and Elections Committee and the Community Affairs Committee.
 - It would next go before the Senate Appropriations Committee.

IX.A. – CONTINUED

- The bill currently indicated that a local ethics commission, such as the COE, must establish a procedure whereby a respondent would be entitled to a public trial by the COE or a hearing officer.
- If SB 1474 became law, the COE would be required to create a procedural process and follow it.
- A variant of SB 1474 provided for a trial by the Department of Administrative Hearings; however, County officials were concerned about the cost factor.
- The COE's ordinance and Rules of Procedure currently provided that if a respondent was charged with a violation and the COE found probable cause, a full public hearing would be handled by the COE or three chair-designated COE members.
- The ordinance and the Rules of Procedure would need revision if SB 1474 became law.
- No public trials have occurred since the COE's inception.
- House Bill 1314 was SB 1474's companion bill, and it contained the same language as SB 1474. It passed the House's Local and Federal Affairs Committee this morning and needed one final approval.

IX.B.

DISCUSSED: Customer Service Visits.

Mr. Cullen said that:

- He conducted six or seven customer service visits and met with various municipal managers or human resources staff.
- The visits should be completed within several months.
- Most of the municipalities were aware of the COE's website.

X. COMMISSION COMMENTS – None

XI. PUBLIC COMMENTS – None

XII. ADJOURNMENT

MOTION to adjourn the meeting. Motion by Michael Kridel, seconded by Clevis Headley, and carried 5-0.

At 3:20 p.m., the chair declared the meeting adjourned.

APPROVED:

Chair/Vice Chair

Sunshine Law Overview

By Leonard W. Berger, Palm Beach County Chief Assistant County Attorney

- ✦ All meetings of public agencies at which official acts are taken must be open to the public.
- ✦ The term “official acts” includes not only the final act of the public agency, but **every step in the decision making process** which leads to the final act.

Personal Responsibility

- ✦ The Sunshine Law applies to you because of **your role in the decision making process**.
- ✦ The law is **broadly construed** to ensure the entire **decision making process** is open to the public. Courts have consistently found that the law is violated any time actions are taken to evade the open meeting requirement. This includes voting by secret ballot, straw polls, or any communication, whether live, through written correspondence, through an intermediary, or by electronic media, between two or more board members in private to discuss matters that will likely come before the board they serve.

Agency Responsibility

- ✦ There must be **reasonable notice** of all meetings – sufficient to inform an enable interested persons so they can attend.
- ✦ The meeting must be held at a place **accessible to the public**.
- ✦ **Minutes** must be recorded and made available to the public.

Consequences

- ✦ Knowingly violating the Sunshine Law is a **second degree misdemeanor** = \$500 fine/6 mos jail, or both.
- ✦ Violations are also subject to a \$500 **civil penalty**.
- ✦ Agency decisions linked to a violation **can be rendered void**, although in some situations, decisions have been reinstated after full, public airing of the decision at issue.
- ✦ Agency must **pay attorney’s fees and costs** to person who successfully alleges Sunshine Law violation.

CRIMINAL PROSECUTION OF THE SUNSHINE LAW

Daniel E. Funk

Assistant State Attorney, Public Corruption Unit, 15th Judicial Circuit

PUBLIC POLICY OF OPEN GOVERNMENT

“The best way to ensure that government truly represents the people it serves is to keep the government open and accessible to those people.” Office of the Attorney General

WHAT MEETINGS ARE SUBJECT TO THE SUNSHINE LAW?

- Written correspondence between board members
- Meetings conducted over the telephone or using electronic media technology
- Delegation of authority or the decision making function
- Use of nonmembers as liaisons between board members

WHAT TYPES OF DISCUSSIONS ARE COVERED BY THE SUNSHINE LAW?

- Informal discussions or workshops or any gathering, whether formal or informal, between two or more members of the commission regarding a subject matter where foreseeable action will be taken
- Investigative meetings or meetings to consider confidential material
- Legal matters
- Personnel matters
- Purchasing or bid evaluation committees
- Quasi-judicial proceedings
- Real property negotiations

WHAT RECORDS ARE SUBJECT TO THE SUNSHINE LAWS?

- Assume everything and then look at exceptions

EXAMPLE

- South Bay, Florida



Palm Beach County Commission on Ethics

Commissioners

Salesia V. Smith-Gordon, Chair
Michael S. Kridel, Vice Chair
Michael F. Loffredo
Carmine A. Priore
Clevis Headley

Executive Director

Steven P. Cullen

April 8, 2014

Ms. Janice C. Rutan, Town Administrator
Town of Haverhill
4585 Charlotte Street
Haverhill, FL 33417

Re: RQO 14-007
Misuse of Office

Dear Ms. Rutan:

Your request for an expedited advisory opinion pursuant to Commission on Ethics Rule of Procedure 2.6 has been received and reviewed. The opinion rendered is as follows:

QUESTION:

May the Town of Haverhill (the Town) hire the daughter of the provider of the Town's website maintenance and if so, is there any impact upon the relationship between the Town, the employee, and the service provider?

ANSWER:

Based on the facts you have submitted, the hiring of the daughter of the provider of the Town's website maintenance is not prohibited by the Code of Ethics as long as the daughter does not use her official position to benefit her parent's business, which would be a misuse of public office or employment. Under the Code, the applicant, if hired, will need to take great care to avoid acting, failing to act, or influencing others to act in a manner that would appear to favor her parent's company. She will have an ongoing responsibility to refrain from using her official position with the Town to gain a financial benefit for her parent. This would include any improper action or inaction involving the awarding of Town business to her parent's business.

FACTS:

The facts, as we understand them from your email dated March 27, 2014, and obtained from follow-ups with COE staff, are as follows:

You are the Town Administrator. The Town recently advertised for an Administrative Assistant who, when hired, will report directly to the Town Administrator. One of the applicants, who was offered the position and accepted it, is the daughter of the owner of the business that the Town uses to maintain and update the Town's website. The parent's business performs its work remotely and has a

The Historic 1916 Palm Beach County Courthouse

300 North Dixie Highway, Suite 450, West Palm Beach, FL 33401 561.355.1915 FAX: 561.355.1904

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Website: www.palmbeachcountyethics.com

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non-contractual agreement with the Town for services to be provided as needed. The applicant does not have any ownership interest in the parent's business, which has been providing these services to the Town since 2009. One of the duties of the Administrative Assistant will be to furnish information and updates to the website manager. Therefore, the Administrative Assistant would have professional interaction with her parent's business as part of the required job duties.

LEGAL BASIS:

The legal basis for this opinion is found in Section 2-443(a) and Section 2-443(b) of the Code:

Section 2-443(a) prohibits employees from using their official positions to obtain a special financial benefit, not shared with similarly situated members of the general public, for certain entities or persons, including themselves and their parents. Section 2-443(b) prohibits employees from using their official positions to corruptly secure or attempt to secure a special privilege or benefit for themselves or others. As defined by the Code, corruptly means done with a wrongful intent and for the purpose of obtaining a special benefit for any person, inconsistent with the proper performance of the employee's public duties.

Section 2-443(d) prohibits officials and employees from entering into "any contract or other transaction for goods or services with the [Town]" either directly or indirectly, through the official or employee's outside employer or business. An outside business is defined in section 2-442(2) as "Any entity located in the [Town] or which does business with or is regulated by the [Town], in which the official or employee has an ownership interest..." Under the facts you have provided, the prohibited contractual relationships section does not apply since the applicant does not have an ownership interest in her parent's business.

This opinion construes the Palm Beach County Code of Ethics Ordinance and is based upon the facts and circumstances that you have submitted. It is not applicable to any conflict under state law. Inquiries regarding possible conflicts under state law should be directed to the State of Florida Commission on Ethics.

Please feel free to contact me at 561-355-1915 if I can be of any further assistance in this matter.

Sincerely,



Steven P. Cullen
Executive Director

CEK/gal



Palm Beach County Commission on Ethics

Commissioners

Salesia V. Smith-Gordon, Chair
Michael S. Kridel, Vice Chair
Michael F. Loffredo
Carmine A. Priore
Clevis Headley

Executive Director

Steven P. Cullen

April 9, 2014

Ms. Kazia Bieluch, Forensic Technician
Palm Beach County Medical Examiner's Office
3126 Gun Club Rd.
West Palm Beach, FL, 33406

Re: RQO 14-008
Outside Employment

Dear Ms. Bieluch,

Your request for an expedited advisory opinion pursuant to Commission on Ethics Rule of Procedure 2.6 has been received and reviewed. The opinion rendered is as follows:

QUESTION: Whether you, as an employee of Palm Beach County, may accept part-time outside employment at a funeral home removal service company?

ANSWER: Based on the facts you have submitted, your part-time employment with a funeral home removal service company would not violate the prohibited contracts section of the Code of Ethics, as you have submitted sufficient pertinent facts and circumstances which demonstrate that you have complied with all requirements as set forth in §2-443(e)(5), including merit rule approval by your supervisor. However, your responsibility to comply with the code is ongoing. Should there be any change in circumstance with regard to your compliance with the requirements of §2-443(e)(5), you will need to either terminate your part-time employment or seek an advisory opinion from this commission reflecting the change in circumstance. Notwithstanding, you have an ongoing responsibility to refrain from using your official position as a county employee to obtain a financial benefit for yourself or your outside employer.

FACTS: The facts, as we understand them from your email dated April 3, 2014 are as follows:

You are a forensic technician for the Palm Beach County Medical Examiner's Office. The Medical Examiner's Office conducts investigations of violent, sudden, unexpected, and suspicious deaths occurring within the County, or any death where there is no doctor in attendance. You are seeking part-time outside employment at a funeral home removal service company that works with the Medical Examiner's Office. The company removes bodies of deceased persons from homes, hospitals, and the Medical Examiner's Office and then delivers them to funeral homes or crematories. According to the information you provided, the funeral home removal service company contracts with the Medical Examiner's Office. You do not enforce, oversee or administer any of the contracts, and you have not participated in determining the award or the contract requirements. Your county job responsibilities do not require your involvement in any of these contracts, and none of your relatives are involved in any of the above mentioned facets of these contracts. Finally, you have obtained written permission from your supervisor, Chief Medical Examiner Dr. Michael Bell.

The Historic 1916 Palm Beach County Courthouse

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May 1, 2014
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LEGAL BASIS: The legal basis for this opinion is found in the §2-443(d), §2-443(e)(5), and §2-443(a) of the Code:

Section 2-443(d) prohibits you from entering into any contract or other transaction to provide goods or services to the public entity you serve, including any contract or transaction between your public employer and your outside employer. An outside employer includes any business that employs you for compensation and is not another government agency.¹ There are enumerated waivers and exceptions to Section 2-443(d).

Section 2-443(e)(5) establishes a process by which the prohibition is waived for employees. This waiver provision reads as follows:

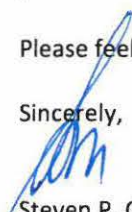
- 5) Notwithstanding any provision to the contrary, subsection (d) shall not be construed to prevent an employee from seeking part-time employment with an outside employer who has entered into a contract for goods or services with the county or municipality as applicable provided that:
 - a. The employee or relative of the employee does not work in the county or municipal department as applicable which will enforce, oversee or administer the subject contract; and
 - b. The outside employment would not interfere with or otherwise impair his or her independence of judgment or otherwise interfere with the full and faithful performance of his or her public duties to the county or municipality as applicable; and
 - c. The employee or relative of the employee has not participated in determining the subject contract requirements or awarding the contract; and
 - d. The employee's job responsibilities and job description will not require him or her to be involved in the outside employer's contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination or forbearance; and
 - e. The employee demonstrates compliance with applicable merit rules regarding outside employment and obtains written permission from his or her supervisor; and
 - f. The employee has obtained a conflict of interest waiver from the chief administrative officer and the employee's department head of the county or municipality based on a finding that no conflict exists. The employee shall submit the request for waiver in writing and under oath.

Section 2-443(a) also prohibits you from using your official position with the county to benefit yourself or your outside employer, in a manner not shared with similarly situated members of the general public.

This opinion construes the Palm Beach County Code of Ethics Ordinance and is based upon the facts and circumstances that you have submitted. It is not applicable to any conflict under state law. Inquiries regarding possible conflicts under state law should be directed to the State of Florida Commission on Ethics.

Please feel free to contact me at 561-355-1915 if I can be of any further assistance in this matter.

Sincerely,


Steven P. Cullen
Executive Director

CEK/gal

¹ § 2-442

May 2, 2014

Donald Thomas, Operational Captain
Palm Beach County Fire Rescue, Station 33
830 Kirk Road
West Palm Beach, FL 33406

Re: RQO 14-009
Outside Employment

Dear Captain Thomas,

The Palm Beach County Commission on Ethics (COE) considered your request for an advisory opinion, and rendered its opinion at a public meeting held on May 1, 2014.

QUESTION:

May you, as a Palm Beach County employee who also works as a sales representative for Schaeffer's Specialized Lubricants (Schaeffer's), sell the Schaeffer's product to your County employer and does your employment with Schaeffer's affect your County employer's ability to purchase the product?

ANSWER:

Based on the facts you have submitted, you may not use your official position as a County employee in to promote the Schaeffer's product. However, you are not prohibited from trying to sell the Schaeffer's products to the County in your personal capacity and on your own time. Best practices would include refraining from using your official position, title, or county email to pitch the Schaeffer's product to the County. At all times, you must follow the channels or procedures that are available to any representative who wishes to sell products to the County. Additionally, you must comply with Section 2-443(e)(5) as listed below and should obtain a conflict of interest waiver for your part-time outside employment prior to the County potentially entering into a contract with Schaeffer's to purchase the product.

FACTS:

The facts, as we understand them, are as follows:

You have worked at Palm Beach Fire Rescue for over 13 years. You are an operational captain at Station 33, and you have worked extensively on heavy trucks. You are a current sales representative for Schaeffer's, where your compensation is commission-based. As a sales representative, you are the liaison between Schaeffer's and the client. Palm Beach County currently does not have a contract with Schaeffer's. You believe that Schaeffer's could benefit the fleet maintenance department at Palm Beach County Fire Rescue because of the product's extended oil drains, reduced maintenance costs, and reduced repair costs. You have no control over pricing because Schaeffer's utilizes a set price, so you will not be in a position to try to outbid or underbid any competitors.

LEGAL BASIS:

The legal basis for this opinion is found in §2-443(a), §2-443(b), §2-443(d), and §2-443(e)(5) of the Code:

Section 2-443(a) prohibits you from using your official position with the county to benefit yourself or your outside employer, in a manner not shared with similarly situated members of the general public.

Section 2-443(b) also prohibits you from taking any official action to corruptly secure or attempt to secure a special privilege or benefit for yourself or for anyone else. As defined by the Code, corruptly means done with a wrongful intent and for the purpose of obtaining a special benefit for any person, inconsistent with the proper performance of your public duties.¹

Section 2-443(d) prohibits you from entering into any contract or other transaction to provide goods or services to the public entity you serve, including any contract or transaction between your public employer and your outside employer. An outside employer includes any business that employs you for compensation and is not another government agency.² There are enumerated waivers and exceptions to Section 2-443(d). Section 2-443(e)(5) establishes a process by which the prohibition is waived for employees. This waiver provision reads as follows:

- 5) Notwithstanding any provision to the contrary, subsection (d) shall not be construed to prevent an employee from seeking part-time employment with an outside employer who has entered into a contract for goods or services with the county or municipality as applicable provided that:
 - a. The employee or relative of the employee does not work in the county or municipal department as applicable which will enforce, oversee or administer the subject contract; and
 - b. The outside employment would not interfere with or otherwise impair his or her independence of judgment or otherwise interfere with the full and faithful performance of his or her public duties to the county or municipality as applicable; and
 - c. The employee or relative of the employee has not participated in determining the subject contract requirements or awarding the contract; and
 - d. The employee's job responsibilities and job description will not require him to be involved in the outside employer's contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination or forbearance; and
 - e. The employee demonstrates compliance with applicable merit rules regarding outside employment and obtains written permission from his or her supervisor; and
 - f. The employee has obtained a conflict of interest waiver from the chief administrative officer and the employee's department head of the county or municipality based on a finding that no conflict exists. The employee shall submit the request for waiver in writing and under oath.

This opinion construes the Palm Beach County Code of Ethics Ordinance and is based upon the facts and circumstances that you have submitted. It is not applicable to any conflict under state law. Inquiries regarding possible conflicts under state law should be directed to the State of Florida Commission on Ethics.

Please feel free to contact me at 561-355-1915 if I can be of any further assistance in this matter.

Sincerely,

Steven P. Cullen
Executive Director

CEK/gal

¹ § 2-443(b)

² § 2-442

Model Disclosure Rule: Beneficial Interest and Disclosure of Ownership

The purpose of this Model Rule is to help public officials identify conflicts of interest, which may come before them and which may not be apparent or known to the official. Those appearing before boards and commissions and presenting matters for voting are requested to complete the disclosure form prior to their appearance. Commissioners and board members may review the form prior to participating and voting on the matter. By disclosing detailed corporate and financial identities, those persons appearing give the officials the ability to screen in depth for conflicts. The goal is to make any potential conflicts known to the official so that (s)he can make more competent decisions regarding potential voting conflicts.

Beneficial Interest and Disclosure of Ownership

The following is a list of every “person” (as defined in Section 1.01(3), Florida Statutes, to include individuals, children, firms, associates, joint adventures, partnerships, estates, trusts, business trusts, syndicates, fiduciaries, corporations, and all other groups and combinations) holding 5% or more of the beneficial interest in the disclosing entity:

A. Persons or corporate entities with an ownership interest of 5% or more:

Name	Address	Percentage

B. Persons or corporate entities that hold, by proxy, the voting power of 5% or more:

Name	Address	Percentage

C. Stock held for others and for whom it is being held:

Stock Name & For Whom Held	Address	Percentage